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March 7, 2007

BY E-MAIL & HAND DELIVERY

The Honorable Vincent J. Poppiti
BLANK ROME LLP
Chase Manhattan Center
1201 Market Street, Suite 800
Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd v. ViewSonic Corp., et al.*, C.A. No. 04-343-JJF

Dear Special Master Poppiti:

This letter is a joint submission from the parties containing their proposed agendas for the in-person hearing before Your Honor scheduled for March 9, 2007.

I. Defendants propose the following agenda:

1. LPL's Motion for Protective Order Concerning Mr. Bang's Deposition
2. LPL's Motion for Protective Order Concerning Mr. Kim's Deposition
3. Any other issues regarding ongoing depositions and production
4. Review of CAD/CAM files (Tatung Defendants request *in camera* review)
5. Unresolved issues concerning discovery from Tatung Defendants as discussed during the March 2 teleconference
6. Sufficiency of Tatung matrix of related products and LPL's request for product categorizations / sample
7. Sufficiency of Tatung assembly drawings, work instructions and photographs for infringement purposes
8. Viewsonic's Motion for Protective Order To Circumscribe the Scope of Topics for Which ViewSonic Must Produce a Fed. R. Civ. P. 30(b)(6) Witness.

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II. Plaintiff's Propose the following agenda:

As Plaintiff discussed with opposing counsel, the attorneys arguing Tatung's Agenda Item Nos. 1 and 2 are also arguing Tatung Item No. 5. Plaintiffs fail to see any reason why those attorneys need to sit through the review of the CAD/CAM files (Tatung's Item No. 4), before arguing Tatung Item No. 5. Additionally, Plaintiff asked Tatung to explain what issues it sought to include in its catch-all Item No. 3, but received no response. Because it is now impossible to prepare for any additional arguments, Plaintiff does not agree to Tatung's Item No. 3. Finally, as discussed with Tatung today, Plaintiff would like to raise with the Special Master during the hearing on March 8th, Plaintiff's limited participation in the review of the CAD/CAM drawings as they pertain to the documents already produced by Tatung.

Accordingly, Plaintiff's propose the following topics for the March 9th Hearing:

1. LPL's Motion for Protective Order Concerning Mr. Bang's Deposition
2. LPL's Motion for Protective Order Concerning Mr. Kim's Deposition
3. Unresolved issues concerning discovery from Tatung Defendants as discussed during the March 2 teleconference
4. Review of CAD/CAM files (Plaintiff seeks to be present for at least the review of the Tatung documents already produced)
5. Insufficiency of Tatung matrix of related products and LPL's request for product categorizations and samples
6. Insufficiency of Tatung assembly drawings, work instructions and photographs for infringement purposes.

Respectfully,


Anne Shea Gaza
(#4093)

cc: Clerk of Court (via CM/ECF)
Richard Kirk, Esquire (via electronic mail)
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Mark Krietzman, Esquire (via electronic mail)
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